

LAW OFFICE OF KERRY LAWRENCE, PLLC  
140 GRAND STREET  
SUITE 705  
WHITE PLAINS, NEW YORK 10601  
Telephone: (914) 946-5900  
Email: kerry@kerrylawrencelaw.com

Admitted in NY & CT

September 18, 2024

By ECF

Honorable Cathy Seibel  
United States District Judge  
United States Courthouse  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: United States v. Frank Butselaar  
22 Cr. 560 (CS)

Dear Judge Seibel:

On September 6, 2024, Your Honor granted Mr. Butselaar permission to file his response to the Government's extensive Motions *in Limine* in two submissions, with a response to approximately half of the motions due on Friday, September 20<sup>th</sup> and the remainder on Friday, September 27<sup>th</sup>. Yesterday, the Government filed a Superseding Indictment which, while not adding additional counts, impacts our response to almost the entirety of the Government's motions. For this reason, we are asking for brief extensions of the deadlines for Mr. Butselaar to file his response to 12 pm on Monday, September 23<sup>rd</sup> for the first part, and 12 pm on Monday, September 30<sup>th</sup>, for the remainder, which will afford us the two additional weekend days prior to the deadlines.

Thank you for the Court's consideration in this matter.

Respectfully submitted,



Kerry A. Lawrence  
Samidh Guha  
Diane Fischer

cc: All Counsel (via ECF)